



Department of Health and Environment

July 29, 1993

~~Arizona, Phoenix, Arizona~~
Robert C. Harder, Secretary

Reply to:

Mr. Steven M. Keiter
Facility Manager
Hydrocarbon Recyclers, Inc.
2549 North New York
Wichita, Kansas 67219

South Central District Office
1919 N. Amidon, Suite 130
Wichita, Kansas 67203
Phone: (316) 838-1071
Fax: (316) 838-0042

Re: Hazardous Waste Compliance Inspection
EPA Identification Number KSD007246846



R00001708

RCRA Records Center

Dear Mr. Keiter:

On June 30, 1993, your facility was inspected to determine compliance with state hazardous waste regulations. The inspection was also attended by Mr. Mark Bradbury, District Environmental Administrator, KDHE.

The inspection revealed that your facility generates the following hazardous wastes as defined by 40 CFR, Part 261, Subparts C & D as adopted by K.A.R. 28-31-3:

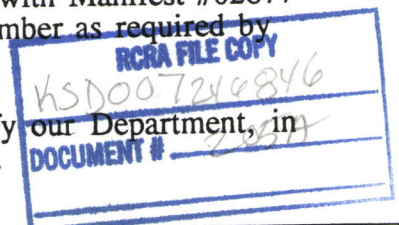
Wastes Generated	Waste Codes
1. Waste Chlorinated Solvents	F001, F002
2. Waste Tetrachloroethylene/Debris	F002
3. Waste Solvents/Paints mixtures	D001, F003, F005
4. Waste - Nonblendable	D004 through D011
5. Waste - Blendable (Kiln Fuel)	D001, F001, F002, F003, F005 D004 through D011, & U-Listed
6. Waste Oxidizers - Class I & II	D001
7. Waste Corrosives	D002, D007
8. Waste Water (Characteristic Ignitable)	D001, D007, D008
9. Contaminated Debris - sweepings, used sampling equipment, clothing, etc...	D001, D002, D007, F001, F006

Based on the information provided, the quantity of hazardous waste generated is more than 1000 kilograms (approximately 2200 pounds) per month. This facility is, therefore, considered an EPA generator and is regulated under K.A.R. 28-31-4, excluding K.A.R. 28-31-4(h) & (m). The facility is an interim status storage, treatment and/or disposal (T/S/D) facility and is regulated under 40 CFR, Part 265, as adopted by K.A.R. 28-31-8. The facility is also subject to the Land Disposal Restriction (LDR) regulations referenced in K.A.R. 28-31-14.

The inspection identified the following item not in compliance with state regulations concerning generators of hazardous waste:

1. Land Disposal Restriction (LDR) Notice. The LDR associated with Manifest #02877 dated April 13, 1993, did not display the manifest document number as required by 40 CFR 268.7, as referenced by K.A.R. 28-31-14.

This deficiency must be corrected by **August 16, 1993**. Please notify our Department, in writing, identifying the action you have taken to correct this deficiency.



Hydrocarbon Recyclers, Inc.
July 29, 1993
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Additional Comments

Correspondence dated October 9, 1992 from Mr. Ron Robertson, HRI Safety and Compliance Officer, indicates you do not consider HRI, Wichita, a "Marketer" of hazardous waste fuels as defined in 40 CFR, Part 266 and, therefore, not subject to the regulations contained in Part 266. From information gathered during the inspection, HRI is not a marketer. However, 40 CFR, Part 266.101 (Management prior to burning.) subjects HRI to standards related to storage "by intermediaries (processors, blenders, distributors, etc.) between the generator and the burner."

The inspection revealed HRI continues to store Mercury Wastes coded U151 and D009 because you are unable to find a suitable, permitted disposal facility. This issue must be resolved between HRI and the original generators of the waste mercury. Please update the Department as to the status of your efforts to resolve this issue.

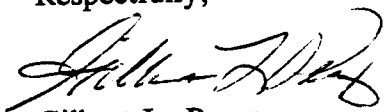
Weekly inspection logs are required to have the date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions. (ref. 40 CFR 265.15(d)). Your multi-page logs have areas designated for "Name" of the inspector. Please instruct your employees who may occasionally be charged with completing the log to enter their full name and not to simply "initial" the subsequent pages. Or, re-format the logs to indicate inspector's "initials" are sufficient. Note: Changes to your weekly inspection forms will affect your Part B permit application. For questions regarding permits contact the Hazardous Waste Section, Bureau of Waste Management, Topeka, at (913) 296-1600.

Hazardous Waste Storage Tank 15C located in management unit D400 was placed out of service due to the discovery of a leak. When returning this tank to service, please refer to the procedure outlined in 40 CFR 265.197(f) for proper certification of the tank repair performed in accordance to 40 CFR 265.197(e), and send a copy of the certification to our Hazardous Waste Section, BWM, in Topeka.

The areas of new construction and expansion at the facility are scheduled for completion in September or October, 1993, according to Mr. Ron Robertson. Mr. Steve Broslavick of our Hazardous Waste Section in Topeka has asked that he be kept informed as to the progress in order that he may conduct a timely review of the improvements.

Thank you for your cooperation with the hazardous waste management program. If you have any questions regarding the inspection, call me at (316) 838-1071.

Respectfully,



Gilbert L. Perez
Environmental Technician
Waste Management Programs
Bureau of District Operations

GLP: HRIinsp.ltr

pc: John Mitchell, BWM, Topeka
Ron Smith, BWM, Topeka ✓
SCD File



Kansas Department of Health and Environment
Bureau of Air and Waste Management
Forbes Field, Topeka, Kansas 66620

Hazardous Waste Generator/Transporter Compliance Inspection Report

General

Time 8:30 a.m. Date 30 June 93

Facility Name Hydrocarbon Recyclers, Inc. EPA ID No. KSD 007246846

Street 2549 North New York City Wichita, KS Zip 67219

Mailing Address (if different than above) _____

County Sedgwick Phone (316) 268-9490

Contact(s) Steve Keiter, Facility Manager (not present during inspection)

Ron Robertson, Safety & Compliance Officer Cary Mass, Plant Engineer

Inspector(s) Gil Perez, KDE, Wichita

Type of Business Interim Status TSD

Has the company declared any information/processes as trade secrets (KSA 65-3447)? Yes No
If yes, explain.

Industrial Wastes Generated

(List hazardous wastes first) Waste quantities & movement is tracked using computer program "FIMS." see add'l comment

Waste:	Waste Chlorinated Solvents	Waste Tetrachloroethylene / Debris
If waste is hazardous, give HW ID Number:	F001, F002	F002
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	HRI - Tulsa & San Antonio	Rollins, Deerpark Tx.

Waste:	Waste Solvents/Paints mixtures	Waste Non-blendable
If waste is hazardous, give HW ID Number:	D001, F003, F005	D004 through D011
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Systech, Fredonia, KS (Kiln Fuel)	USPCI - Lone Mt, OK. Incineration - Rollins or ENSCO

Waste:	Waste Blendables (Kiln Fuel)	Waste Oxidizers - Class I & II
If waste is hazardous, give HW ID Number:	D001, F001, F002, F003, F005 D004 through D011 & U-Listed	D001
Amount generated per month:	D018-43 per analyses.	
Amount presently in storage:		
Accumulation time:		
Present disposal method:	Systech - Fredonia, KS Heartland Cement, Independence	Incineration - Rollins or ENSCO (w/ listed codes)

Waste:	Waste Corrosives	Waste water (D001)
If waste is hazardous, give HW ID Number:	D002, D007	D001, D007, D008
Amount generated per month:		
Amount presently in storage:		
Accumulation time:		
Present disposal method:	USPCI - Lone Mt, OK.	Incineration - Gibraltar, TX or Deep Well Injection

Waste:	Contaminated Debris	Non-hazardous waste water	Used Oil
If waste is hazardous, give HW ID Number:	D001, D002, D007, F001, F006	na	na
Amount generated per month:	new process - need to check *		
Amount presently in storage:			
Accumulation time:			
Present disposal method:	N/A accumulating	Deep Well or Lone Mt.	Systech

*as related to permit.

General Requirements (GGR)

- I. Has the facility evaluated all potentially hazardous waste(s) to determine if it is hazardous? (KAR 28-31-4(b)) ☒ Yes ☐ No
- A. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? (KAR 28-31-4(b)(3)(A)) ☒ Yes ☐ No ☐ NA
- B. If waste(s) was tested, are the results kept for three years? (KAR 28-31-4(f)(1)(C)) ☒ Yes ☐ No ☐ NA
- II. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has written permission been obtained from the operator of the POTW? (KAR 28-31-3/40 CFR 261.4) Yes ☐ No ☒ NA
- III. If industrial waste(s) is disposed of at a permitted sanitary landfill, has a disposal authorization been obtained? (KAR 28-29-23) Yes ☐ No ☒ NA
- A. If yes, list the authorization number(s): _____
- IV. Facility size classification:
- | | | | |
|--|---|---|--|
| <input type="checkbox"/> Not a Generator | <input type="checkbox"/> Small Qty. Generator | <input type="checkbox"/> Kansas Generator | <input checked="" type="checkbox"/> EPA Generator |
| <input checked="" type="checkbox"/> T/S/D Facility | <input checked="" type="checkbox"/> Transporter | <input type="checkbox"/> HW Burner/Marketer | <input checked="" type="checkbox"/> Used oil Burner/Marketer |

Hazardous Waste Determination Requirements: ☒ Adequate ☐ Inadequate

Notification Requirements (GGR)

- V. Has generator notified KDHE and obtained an EPA Identification Number? (KAR 28-31-4(c)) ☒ Yes ☐ No ☐ NA
- VI. Is current notification accurate? (KAR 28-31-4(c)(1)) ☒ Yes ☐ No ☐ NA
- A. Is this facility marketing (selling) hazardous waste as a fuel? ☒ Yes ☐ No ☐ NA
- B. Is this facility marketing (selling) used oil as a fuel? ☒ Yes ☐ No ☐ NA
- (If yes, to either question A or B, complete Used Oil Fuel Marketers/Blenders Checklist.)
- C. Is this facility burning hazardous waste as a fuel? Yes ☐ No ☒ NA
- D. Is this facility burning used oil as a fuel? Yes ☐ No ☒ NA

Notification Requirements: ☒ Adequate ☐ Inadequate ☐ NA

(If small quantity generator, stop here.)

Manifests (GMR)

VII. Is a contractual agreement used in place of manifesting? (KAR 28-31-4(d)(7)(A-C)/40 CFR 262.20(e)(1-2))	Yes	No	
A: If yes, does the contractual agreement include the type of waste and frequency of shipments?	Yes	No	
B. If yes, is the vehicle used to transport the waste owned and operated by the reclaimer of the waste?	Yes	No	
C. If yes, is a copy of the agreement kept for a period of three years after termination of agreement?	Yes	No	<input checked="" type="radio"/> NA
VIII. Is a current manifest showing revision date and burden disclosure statement used? (KAR 28-31-4(d)/40 CFR 262.20)	<input checked="" type="radio"/> Yes	No	NA
A. If yes, does manifest(s) include:			
1. Generator EPA Identification Number (12 digit) and manifest document number (five digit)?	<input checked="" type="radio"/> Yes	No	NA
2. Number of pages?	<input checked="" type="radio"/> Yes	No	
3. Generator's name and mailing address?	<input checked="" type="radio"/> Yes	No	
4. Generator's phone number?	<input checked="" type="radio"/> Yes	No	
5. Transporter 1 Name?	<input checked="" type="radio"/> Yes	No	
6. Transporter 1 EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
7. Transporter 2 Name?	<input checked="" type="radio"/> Yes	No	NA
8. Transporter 2 EPA Identification Number?	<input checked="" type="radio"/> Yes	No	NA
9. Name and site address of designated facility?	<input checked="" type="radio"/> Yes	No	
10. Designated facility's EPA Identification Number?	<input checked="" type="radio"/> Yes	No	
11. Waste Description (DOT shipping name, hazard class, and Identification Number)?	<input checked="" type="radio"/> Yes	No	
12. Number and type of containers?	<input checked="" type="radio"/> Yes	No	
13. Total quantity?	<input checked="" type="radio"/> Yes	No	
14. Unit (weight or volume)?	<input checked="" type="radio"/> Yes	No	
15. Special handling instructions?	<input checked="" type="radio"/> Yes	No	NA
16. Generator's certification including waste minimization statement, generator's signature, and date?	<input checked="" type="radio"/> Yes	No	
17. Name, signature, and date of transporter 1?	<input checked="" type="radio"/> Yes	No	
18. Name, signature, and date of transporter 2?	<input checked="" type="radio"/> Yes	No	NA
B. Does generator retain a copy of manifest(s) signed by both generator and transporter? (KAR 28-31-4(d)(4)(A-C))	<input checked="" type="radio"/> Yes	No	
C. Does generator retain copy of manifest(s) signed and dated by T/S/D/ facility owner/operator for three years? (KAR 28-31-4(f)(1)(A))	<input checked="" type="radio"/> Yes	No	
D. Has generator ever failed to receive a signed copy of a manifest within 45 days of initiating a shipment?	Yes	<input checked="" type="radio"/> No	
1. If yes, was exception report(s) filed? (KAR 28-31-4(f)(4)(B))	Yes	No	<input checked="" type="radio"/> NA
2. If yes, was copy retained for three years? (KAR 28-31-4(f)(1)(A))	Yes	No	<input checked="" type="radio"/> NA

Manifesting Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Land Disposal Restrictions Requirements (GLB)

- IX. Does facility generate any wastes subject to the land disposal restrictions requirements of 40 CFR 268, Subparts B and C?

Yes ☒ No ☐

List these wastes: *All wastes.*

A. _____ D. _____
B. _____ E. _____
C. _____ F. _____

- X. Is the waste(s) covered by a National Variance(s), Extension, or Petition? (40 CFR 268 5&6)

Yes ☐ No ☒

A. If yes, describe the variance, extension, or petition which applies:

- XI. Is the waste covered by an exemption? (40 CFR 268.1(c)(2))

Yes ☐ No ☒

A. If yes, does the generator provide a notice with the waste to the T/S/D facility stating that the waste is exempt from the land disposal restrictions? (40 CFR 268.7(a)(3))

Yes ☐ No ☐

- XII. Does generator ship waste(s) covered by the Land Disposal Restrictions off-site for treatment or disposal?

Yes ☒ No ☐

A. If yes, does the generator provide a notification to the T/S/D facility that includes: EPA hazardous waste number(s), applicable treatment standards, manifest number(s), and waste analysis data, if available? (40 CFR 268.7) **one LDR did not have MDN no. transferred. (exception.)*

Yes ☒ No ☐

B. If yes, is a copy of this notification kept for five years?

Yes ☒ No ☐

- XIII. Does generator treat restricted waste(s) on-site so that they are below the land disposal restrictions standards? (If yes, fill out land disposal restrictions checklist.)

Yes ☐ No ☒

Land Disposal Restrictions Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Pre-Transport Requirements (GPT)

- XIV. Does generator package waste in accordance with DOT requirements? (KAR 28-31-4(e)(1))

Yes ☒ No ☐ NA ☐

- XV. Does generator label (flammable liquid, poison, etc.) each package in accordance with DOT requirements of 49 CFR 172.101 or 172.102? (KAR 28-31-4(e)(2))

Yes ☒ No ☐ NA ☐

- XVI. Does generator mark (consignee's or consignor's name and address, etc.) on each package in accordance with DOT requirements of 40 CFR 172 Subpart D? (KAR 28-31-4(e)(3))

Yes ☒ No ☐ NA ☐

A. Does generator mark each container of 110 gallons or less as below? (KAR 28-31-4(e)(3))

Yes ☒ No ☐ NA ☐

Hazardous Waste - Federal Law Prohibits Improper Disposal.
If found, contact the nearest police or public safety authority or the US EPA.

Generator's Name and Address

Manifest Document Number

- XVII. Does generator have placards to offer to transporters in accordance with 49 CFR 172 Subpart F? (KAR 28-31-4(e)(4))

Yes ☐ No ☐ NA ☐

XVIII. Does generator only use a transporter who is properly registered with the department? (KAR 28-31-4(c)(2))

☒ Yes ☐ No ☐ NA

Pre-Transport Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Biennial Reports (GRR)

XIX. Has generator submitted a biennial report(s) to KDHE? (KAR 28-31-4(f)(2))

☒ Yes ☐ No ☐ NA

A. If yes, does generator retain copies for three years? (KAR 28-31-4(f)(1)(B))

☒ Yes ☐ No ☐ NA

(Note: compare quantities reported on last biennial report with the total quantity of all manifests for those years.)

Biennial Report Requirements:

☒ Adequate

☐ Inadequate

Special Conditions (GSC)

XX. Has generator received or transported any hazardous waste to or from a foreign source? (40 CFR Subpart E & F)

☒ Yes ☐ No

A. If yes, has generator filed a notice with the Secretary of Health and Environment?

☒ Yes ☐ No ☐ NA

B. Is waste manifested and signed by a foreign consignee?

☒ Yes ☐ No ☐ NA

C. If generator transports waste out of the country, has confirmation of delivered shipment been received?

Yes ☐ No ☒ NA

Special Conditions Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Storage Requirements (GPT)

XXI. Does generator temporarily store waste before transport?

☒ Yes ☐ No

A. For 90 days or less?

☒ Yes ☐ No ☐ NA

B. For more than 90 days?

☒ Yes ☐ No ☐ NA

C. If waste is stored in containers:

1. Are containers marked with the words: "Hazardous Waste"? (KAR 28-31-4(g)(3) or (h)(1)(D))

☒ Yes ☐ No ☐ NA

2. Is the accumulation start date marked on each container? (KAR 28-31-4(g)(2) or (h)(1)(C))

☒ Yes ☐ No ☐ NA

3. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (KAR 28-31-4(g)(1) or (h)(1)(B))

☒ Yes ☐ No ☐ NA

4. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? (KAR 28-31-4(k))

☒ Yes ☐ No ☐ NA

a. If yes, are these inspections documented in a log that includes date and time of inspection, full name of inspector, notations of observations, and date and nature of remedial actions? (KAR 28-31-4(k)/40 CFR 265.15(d))

☒ Yes ☐ No ☐ NA

5. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the facility's property line? (EPA Generator and T/S/D Only) (KAR 28-31-4(g)(1) / 40 CFR 265.176)

Yes No NA

6. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? (KAR 28-31-4(g)(1) or (h)(1)(B) / 40 CFR 265.177)

Yes No NA

7. Does generator have any satellite storage areas? (KAR 28-31-4(j))

Yes No NA

If yes,

- a. Is the waste stored in a container at or near the point of generation and under the control of the operator of the process generating the waste?
- b. Is the container in good condition and closed except to add or remove waste?
- c. Is the container marked with the words: "Hazardous Waste"?
- d. Is the container marked with the accumulation start date at the time it becomes full?
- e. Is the full container moved to the storage area within three days after it became full?

Yes No

Yes No

Yes No

Yes No

Yes No

(If waste(s) is placed in tanks, piles, or surface impoundments, complete the appropriate inspection checklist.)

Storage Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Kansas Generator's Emergency Preparedness (GSO)

XXII. Has facility named one employee as emergency coordinator? (KAR 28-31-4(h)(1)(E))

Yes No

A. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time?

Yes No

B. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise?

Yes No

C. Is the emergency coordinator familiar with the reporting requirements of KAR 28-31-4(h)(2)?

Yes No

XXIII. Is the following information posted next to at least one telephone which is immediately assessable in an emergency? (KAR 28-31-4(h)(1)(F))

A. Name and telephone of emergency coordinator?

Yes No

B. Location of fire extinguishers, fire alarms, or spill control material, if available?

Yes No

C. Telephone number of fire department unless the facility has a direct alarm?

Yes No NA

XXIV. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? (KAR 28-31-4(h)(1)(G))

Yes No

A. Is this training documented in any way?

Yes No

Kansas Generator's Emergency
Preparedness Requirements :

☐ Adequate

☐ Inadequate

☒ NA

(If Kansas generator, stop here.)

Preparedness and Prevention (GPT)

XXV. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:

- | | | | |
|---|--------------------------------------|-------------------------------------|--------------------------|
| A. Internal communication or alarm system easily accessible in case of emergency? (KAR 28-31-4(g)(4)/40 CFR 265.32(a)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (KAR 28-31-4(g)(4)/40 CFR 265.32(b)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| C. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? (KAR 28-31-4(g)(4)/40 CFR 265.32(c)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| D. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (KAR 28-31-4(g)(4)/40 CFR 265.32(d)) | <input checked="" type="radio"/> Yes | <input checked="" type="radio"/> No | <input type="radio"/> NA |
| E. Is this equipment (A-C above) tested and maintained to ensure its proper operation? (KAR 28-31-4(g)(4)/40 CFR 265.33) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |

XXVI. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (KAR 28-31-4(g)(4)/40 CFR 265.35)

☒ Yes ☐ No ☐ NA

XXVII. If appropriate for the type(s) of waste handled, has the owner/operator made the following arrangements:

- | | | | |
|---|--------------------------------------|--------------------------|--------------------------|
| A. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| B. Designated one authority where one or more police or fire departments might respond to an emergency? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| C. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| D. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility? (KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)) | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |

XXVIII. In cases where local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (KAR 28-31-4(g)(4)/40 CFR 265.37(b))

☐ Yes ☐ No ☒ NA

Preparedness and Prevention Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Personnel Training (GPT)

XXIX. Has the owner/operator established a hazardous waste management training program? (KAR 28-31-4(g)(4)/40 CFR 265.16)

☒ Yes ☐ No

A. Is the program directed by a person trained in hazardous waste management? (40 CFR 265.16(a)(2))

☒ Yes ☐ No

B. Are new personnel trained within six months after their employment? (40 CFR 265.16(b))

☒ Yes ☐ No

C. Are new employees supervised until training is completed? (40 CFR 265.16(b))

☒ Yes ☐ No

D. After initial training, are employees trained on an annual basis? (40 CFR 265.16(c))

☒ Yes ☐ No

E. Does the facility maintain the following documents and records:

1. Job title and job description for each position related to hazardous waste management? (40 CFR 265.16(d)(1)&(2))

☒ Yes ☐ No

2. Description of type and amount of training to be given each person? (40 CFR 265.16(d)(3))

☒ Yes ☐ No

3. Records of training given to facility personnel? (40 CFR 265.16(d)(4))

☒ Yes ☐ No

Personnel Training Requirements:

☒ Adequate

☐ Inadequate

Contingency Plan (GPT)

XXX. Does the facility have a contingency plan? (KAR 28-31-4(g)(4)/40 CFR 265 Subpart D)

If yes,

- A. Does the plan list the name(s), home address, and phone number of designated emergency coordinator(s) in the order in which they should be contacted? (40 CFR 265.52(d))
- B. Is an emergency coordinator available at all times? (40 CFR 265.55)
- C. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? (40 CFR 265.52(a))
- D. Does the plan describe arrangements made with emergency response agencies? (40 CFR 265.52(c))
- E. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (40 CFR 265.52(e))
- F. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? (40 CFR 265.52(f))
- G. Have copies of the plan been provided to outside emergency response agencies and hospitals? (40 CFR 265.53)

Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No
Yes	No

Contingency Plan Requirements:

☒ Adequate

☐ Inadequate

(If EPA generator, stop here.)

Transporter Requirements (TRR)

XXXI. Does this facility transport hazardous waste? *HW transporter dba USPCI (HRI parent)* ☒ Yes ☐ No
If yes,

A. Are they registered as a hazardous waste transporter in the state of Kansas? (KAR 28-31-6 (b)) ☒ Yes ☐ No

B. Does transporter comply with the manifest requirements of 40 CFR Part 263.20 except 263.20(h)? ☒ Yes ☐ No

C. Does transporter retain a copy of the manifest for three years? (40 CFR 263.22(a)) ☒ Yes ☐ No

D. Does this facility transport hazardous waste subject to the manifest exemption of KAR 28-31-4(d)(7)? ☒ Yes ☐ No
If yes,

1. Does the transporter record the name, address, and EPA ID Number of the generator; quantity of waste shipped; DOT shipping information; and the date the waste was accepted in a log or shipping paper? ☒ Yes ☐ No

2. Does the transporter carry this record when transporting the waste to the reclamation facility? ☒ Yes ☐ No

3. Does the transporter retain these records for a period of three years after the termination or expiration of the agreement? ☒ Yes ☐ No

Transporter Requirements:

☒ Adequate

☐ Inadequate

☐ NA

Additional Information and Conclusions:

FIMS - Facility Information Management Systems is used at this site to track movement & current location of all hazardous wastes accepted on to the site. See attached "container count" inventory sheet.
EPA (Mark Matthews) is currently monitoring an excavation of old drum buried on site by a previous owner of the property. HRI has entered into an agreement to remediate this excavation site.



RCRA Compliance Inspection Report T/S/D Facilities Checklist 40 CFR Part 265—Interim Status Standards

General

Time 8:30 a.m. Date 30 June 93
Facility Name Hydrocarbon Recyclers, Inc (HRI) EPA ID No. KSD007246846
Street 2549 North New York City Wichita, Kansas Zip 67219
Mailing Address (if different than above) n/a
County Sedgwick Phone (316) 268-9490
Contact(s) Steve Keiter, Facility Manager
Ron Robertson, Safety & Compliance Officer Cary Mans, Plant Engineer
Inspector(s) Gil Perez, KDHE, Wichita
Other _____

Activity at Site

Treatment

- | | | | |
|--|--|---|---|
| <input type="checkbox"/> Chem/Phys/
Bio Treatment | <input type="checkbox"/> Filtration | <input type="checkbox"/> Incineration | <input type="checkbox"/> Recycling/Recovery |
| <input type="checkbox"/> Volume Reduction | <input type="checkbox"/> Reprocessing | <input type="checkbox"/> Solvent Recovery | <input type="checkbox"/> Thermal Treatment |
| <input type="checkbox"/> Waste Oil | <input checked="" type="checkbox"/> Other: <u>Kiln Fuel Blending</u> | | |

Storage

- | | | | |
|---|---------------------------------------|--|--|
| <input checked="" type="checkbox"/> Drums | <input type="checkbox"/> Pile | <input type="checkbox"/> Surface Impoundment | <input checked="" type="checkbox"/> Tank, above ground |
| <input type="checkbox"/> Tank, below ground | <input type="checkbox"/> Other: _____ | | |

Disposal

- | | | | |
|---------------------------------------|-----------------------------------|---|---|
| <input type="checkbox"/> Incineration | <input type="checkbox"/> Landfill | <input type="checkbox"/> Land Treatment | <input type="checkbox"/> Surface
Impoundment |
| <input type="checkbox"/> Other: _____ | | | |

Comments

HRI is an interim status T/S/D Facility specializing in kiln fuel blending. A battery of above-ground storage tanks and ample drum storage makes HRI an active site, funneling waste from around the U.S., Canada, & Mexico. Permit application should go on public notice before the end of 1993. Current permit writer is Steve Broslavick, KDHE, Hazardous Waste Section, Topeka. (913) 296-1609.

Waste Analysis Plan (DGS)

I. Does facility maintain a copy of its waste analysis plan at the facility? (265.13(b))

Yes No

A. If yes, does the plan include:

1. Parameters for which each hazardous waste will be analyzed and rationale for the selection of these parameters? (265.13(b)(1))

Yes No

2. Test methods which are used to test for these parameters? (265.13(b)(2))

Yes No

3. Sampling method used to obtain sample? (265.13(b)(3))

Yes No

4. Frequency with which the initial analysis will be reviewed or repeated to ensure the analysis is current? (265.13(b)(4))

Yes No

5. For off-site facilities, the waste analyses that generators have agreed to supply? (265.13(b)(5))

Yes No NA

6. For off-site facilities, the procedures which are used to inspect and analyze each movement of hazardous waste received to ensure that it matches the identity of the waste designated on the manifest? (265.13(b)(6)) FIMS

Yes No NA

Waste Analysis Plan Requirements:

☒ Adequate

☐ Inadequate

Security (DGS)

II. Does the facility provide either of the following:

A. A 24-hour surveillance system (TV monitoring or guards)? (265.14(b)(1))

Yes No

B. An artificial or natural barrier (fence, fence and cliff combination) and a means to control entry (attendant, TV monitoring, locked entrance, controlled roadway access)? (265.14(b)(2))

Yes No

III. Does the facility provide warning signs at entrances? (265.14(c))

Yes No

IV. Does the facility consider itself exempt from security requirements? (265.14(a)(1)(2))

Yes No

Security requirements:

☒ Adequate

☐ Inadequate

☐ NA

General Inspection Requirements (DGS)

V. Does the owner/operator maintain a written schedule at the facility for inspecting: (265.15(b)(1)(2))

A. Monitoring equipment?

Yes No

B. Safety and emergency equipment?

Yes No

C. Security devices?

Yes No

D. Operating and structural equipment?

Yes No

VII. Does the inspection schedule identify the types of problems which are to be looked for during the inspections? (265.15(b)(3))

Yes No

VIII. Does the owner/operator maintain an inspection log? (265.15(d))

Yes No

A. If yes, does the log contain the:

1. Date and time of inspection?

Yes No

2. Name of inspector?

Yes No

3. Notation of observations?

Yes No

4. Date and nature of repairs or remedial action?

Yes No

Inspection Requirements

☒ Adequate

☐ Inadequate

Personnel Training (DGS)

IX. Does the owner/operator maintain at the facility the following documents and records: (265.16)

- A. Job title and job description for each position related to hazardous waste management? (265.16(d)(1)(2)) Yes No
- B. Description of type and amount of training to be given each person? (265.16(d)(3)) Yes No
- C. Records of training given to facility personnel? (265.16(d)(4)) Yes No

Personnel Training Requirements:

☒ Adequate

☐ Inadequate

Requirements for Ignitable, Reactive, or Incompatible Wastes (DGS)

- X. Does the facility handle ignitable or reactive wastes? (265.17(a)) Yes No
- A. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat? Yes No
- XI. Are smoking and open flames confined to specially designated locations? (265.17(a)) Yes No
- XII. Are "No Smoking" signs posted in hazard areas? (265.17(a)) Yes No
- XIII. Does a check of these areas show any leakage or corrosion of containers? (265.17(b)(4)) Yes No
- XIV. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes? (265.17(b)(1)) Yes No

Ignitable, reactive, or incompatible waste requirements:

☒ Adequate

☐ Inadequate

☐ NA

Preparedness and Prevention (DPP)

- XV. Does an inspection of the facility show any evidence of fire, explosion, or contamination? (265.31) Yes No
- XVI. If applicable to the facility, is the facility equipped with:
- A. Internal communication or alarm system easily accessible in case of emergency? (265.32(a)) Yes No NA
- B. Telephone or hand-held two-way radio capable of summoning emergency response personnel? (265.32(b)) Yes No NA
- XVII. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided? (265.32(c)) Yes No NA
- XVIII. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? (265.32(d)) Yes No NA
where applicable
- XIX. Is the equipment (mentioned above) tested and maintained to ensure its proper operation? (265.33) Yes No NA
- XX. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? (265.35) Yes No NA
- XXI. If appropriate for the type(s) of waste handled, has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside the facility, and possible evacuation routes? (265.37(a)(1)) Yes No NA

- XXII. In areas where more than one police and fire department might respond, is there one designated authority? (265.37(a)(2)) Yes No **NA**
- XXIII. If appropriate for the type(s) of waste handled, does the owner/operator have agreements with state emergency response teams, emergency response contractors, and equipment suppliers? (265.37(a)(3)) **Yes** No NA
- XXIV. If appropriate for the type(s) of waste handled, has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37(a)(4)) **Yes** No NA
- XXV. In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record? (265.37(b)) Yes No **NA**

Preparedness and Prevention Requirements: ☒ Adequate ☐ Inadequate

Contingency Plan and Emergency Procedures (DCP)

- XXVI. Is a contingency plan maintained at the facility and have copies been provided to outside agencies that may be called upon to provide emergency services? (265.53(a)(b)) **Yes** No
- XXVII. Does the plan describe arrangements made with emergency response personnel? (265.52(c)) **Yes** No
- XXVIII. Does the plan list the name(s), home address, and phone number of the designated emergency coordinator(s)? (265.52(d)) **Yes** No
- XXVIX. Is an emergency coordinator available at all times? (265.55) **Yes** No
- XXX. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities? (265.52(e)) **Yes** No
- XXXI. Does the plan include an evacuation plan for facility personnel? (265.52(f)) **Yes** No

Contingency Plan and Emergency Procedures Requirements: ☒ Adequate ☐ Inadequate

Manifest System, Recordkeeping, and Reporting (DMR)

- XXXII. Does the facility receive waste from off-site? (265.71) **Yes** No
- A. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter? (265.71(a)(1-3)) **Yes** No NA
- B. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery? (265.71(a)(4)) **Yes** No NA
- C. Does the owner/operator retain a copy of the manifest? (265.71(a)(5)) **Yes** No NA
- XXXIII. Does the facility receive any waste from a rail or water (bulk shipment) transporter? Yes **No** NA
- A. If yes, is the shipment accompanied by a shipping paper containing the appropriate information? (265.71(b)) Yes No **NA**
1. If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy? (265.71(b)(1-3)) Yes No NA
2. Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery? (265.71(b)(4)) Yes No NA
3. Does the owner/operator retain a copy of the shipping paper? (265.71(b)(5)) Yes No NA

XXXIV. Has the facility received any shipments of waste that were inconsistent with the manifest? (265.72)

Yes No

A. If yes, was an attempt made to reconcile the discrepancy with the generator and transporter? (265.72(b))

Yes No NA

B. If no, was the Regional Administrator notified? (265.72(b))

Yes No NA

XXXV. Does the owner/operator keep a written operating record at the facility? (265.73(a))

Yes No

A. If yes, does the operating record include:

1. A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal? (265.73(b)(1))

Yes No NA

2. The location of each hazardous waste within the facility and the quantity at each location? (265.73(b)(2)) FIMS

Yes No NA

3. Records and result of waste analyses? (265.73(b)(3)).

Yes No NA

4. Reports and details of incidents requiring implementation of the contingency plan? (265.73(b)(4))

Yes No NA

5. Records and results of required inspections? (265.73(b)(5))

Yes No NA

6. Monitoring, testing, or analytical data? (265.73(b)(6))

Yes No NA

7. Closure cost estimates (and for disposal facilities, post-closure cost estimates)? (265.73(b)(7))

Yes No NA

XXXVI. Has the facility received any waste, which does not fall under the small generator exclusion, not accompanied by a manifest or shipping paper? (265.76)

Yes No NA

A. If yes, was an unmanifested waste report submitted to the Regional Administrator?

Yes No NA

Manifest System, Recordkeeping,
and Reporting Requirements:

☒ Adequate

☐ Inadequate

Closure and Post-Closure (DCL)

XXXVII. Does the owner/operator have a written closure plan for the facility? (265.112(a))

Yes No

A. If yes, does the plan include:

1. A description of how and when the facility will be closed? (265.112(b))

Yes No

2. A description of the steps necessary to completely close the facility? (265.112(b)(2))

Yes No

3. An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life? (265.112(b)(3))

Yes No

4. A description of the steps needed to decontaminate facility equipment at the time of closure? (265.112(b)(4))

Yes No

5. An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress? (265.112(b)(5)(6))

Yes No

XXXVIII. If the facility is a disposal facility, does the owner/operator have a written post-closure plan? (265.118(a))

Yes No NA

A. If yes, does the plan include:

1. Ground-water monitoring activities and frequencies at which they will be performed? (265.118(c)(1))

Yes No NA

2. Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment? (265.118(c)(2))

Yes No NA

3. The name, address, and phone number of the person or office to contact during the post-closure period. (265.118(c)(3))

Yes No **NA**

Closure and Post-closure Requirements:

☒ Adequate

☐ Inadequate

Financial Requirements (DFR)

XXXIX. Does the owner/operator have a written estimate of the closure cost? (265.142(a))

Yes No

XL. Has the owner/operator established financial assurance for facility closure and notified the Regional Administrator? (Required after 7-6-82) (265.143)

Yes No

XLI. If the facility is a disposal facility, does the owner/operator have a written estimate of the annual cost of post-closure monitoring and maintenance of the facility? (265.144(a))

Yes No **NA**

XLII. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82) (265.145)

Yes No **NA**

XLIII. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82) (265.147(a))

Yes No

XLIV. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accident occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82) (265.147(b))

Yes No **NA**

Financial Requirements:

☒ Adequate

☐ Inadequate

Management of Containers (DMC)

XLV. Are containers presently used to store hazardous waste? (265.170)

Yes No

A. If no, do not complete questions XLVI through XLIX.

B. If yes, check the condition of containers for evidence of incompatibility of waste with containers. (265.171 and 265.172)

Condition of Containers:

☒ Adequate

☐ Inadequate

☐ NA

XLVI. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste? (265.173)

Yes No NA

XLVII. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors? (265.174)

Yes No NA

XLVIII. Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line? (265.176)

Yes No NA

XLIX. If waste in containers is incompatible with other materials stored nearby, in other containers, piles, open tanks, or surface impoundments, are the containers separated from the other materials by means of a dike, berm, wall, or other device? (265.177)

Yes No NA

Management of Containers:

☒ Adequate

☐ Inadequate

☐ NA

Note: Determine if owner/operator claims any information confidential.

Note: Fill out applicable checklists for specific facility types (i.e. tanks, surface impoundments, piles, land treatment, landfills, groundwater monitoring).

Additional Information and Conclusions

Need to follow-up on status of Tank 15C which was placed out of service due to a leak.

New areas of construction will be operational & in use by next year. These new bldgs need to be inspected.

A new process of washing dismantled equipment is being used by HRI to effect disposal of "DEBRIS" which will be classified as non-hazardous scrap metal after process.

Need to clarify status of DEBRIS and status of process tanks and subsequent effluents & wastes from this process.



Kansas Department of Health and Environment
Bureau of Waste Management
Forbes Field, Topeka, Kansas 66620
(913) 296-1600

Tank Inspection Checklist

Owner Information

Date 30 June 93 EPA I.D. No. KSD 007246846
Facility Name Hydrocarbon Recyclers, Inc. (HRI)
Street 2549 North New York
City Wichita, Kansas Zip 67219

Tank Information

	Tank #1	Tank #2	Tank #3
Description:	* See attached list "HW Tank Storage"		
Capacity:			
Substance Stored:			
Waste Code:			
Location:			

Existing Tank System(s)

- I. Is the tank(s) labeled with the words "Hazardous Waste"? (K.A.R. 28-31-4) ☒ Yes ☐ No
- II. If the tank(s) is not covered, does it have at least 2 feet (60 cm) of freeboard unless equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would provide? (40 CFR 265.192(c)) ☐ Yes ☐ No ☒ NA
- III. Is the tank(s) equipped with a waste-feed cutoff or bypass system(s) as required by 40 CFR 265.192(b and d)? ☒ Yes ☐ No
- IV. Are daily inspections made of all systems pertinent to the proper operation of the tank?
- A. Discharge and cutoff systems? ☒ Yes ☐ No ☐ NA
- B. Tank level and freeboard? ☐ Yes ☐ No ☒ NA
- C. Drainage systems? ☐ Yes ☐ No ☒ NA

- D. Above-ground portions ☒ corrosion? Tank ISC found ☒ leaking. ☒ Yes ☐ No ☐ NA
- E. Monitoring and leak detection equipment? ☒ Yes ☐ No ☐ NA
- F. Secondary containment? ☒ Yes ☐ No ☐ NA
- V. Are these inspections documented in a log? ☒ Yes ☐ No
- A. In the case of a permitted T/S/D facility, do they follow the inspection schedule outlined in their permit? ☐ Yes ☒ No ☐ NA
- VI. Has the tank(s) been used to treat or store wastes substantially different from previous wastes or have substantially different treatment processes been used in the tank(s)? ☐ Yes ☒ No
- A. If yes, were waste analyses and trial treatment or storage tests conducted prior to implementing the proposed changes and is all the data kept on file in the facility operating record or was written, documented information on similar storage or treatment process changes obtained prior to implementing the proposed changes and is all documentation kept on file in the facility operating record? ☐ Yes ☐ No ☒ NA
- VII. With the exception of emergency situations, have ignitable or reactive wastes been placed in the tank(s) by the facility? ☒ Yes ☐ No ☐ NA
- A. If yes, has the facility insured the safety of the operation by one or both of the following methods (40 CFR 265.98)?
1. Was the waste treated immediately before or after being placed in the tank(s) so that it is no longer ignitable or reactive and such treatment is done in compliance with the safety requirements of 40 CFR 265.15(b)? ☐ Yes ☒ No ☐ NA
 2. Was the waste stored or treated under protected conditions eliminating the possibility of ignition or reaction? ☒ Yes ☐ No ☐ NA
- VIII. If a covered tank(s) is used to treat or store ignitable or reactive wastes, does the facility meet the NFPA buffer zone requirements? (40 CFR 265.198(b)) ☒ Yes ☐ No ☐ NA
- IX. If incompatible waste materials are placed in the same tank(s) or are put in a contaminated tank(s), is this done under completely controlled and safe conditions as specified in 40 CFR 265.199? ☐ Yes ☐ No ☒ NA
- X. If the tank(s) has cathodic protection systems, is it inspected according to the following schedule (40 CFR 265.195(b))?
- ☐ Yes ☐ No ☒ NA
- A. Was proper operation confirmed within 6 months of installation and annually thereafter? ☐ Yes ☐ No ☒ NA
- B. Are induced current sources inspected/tested at least bimonthly? ☐ Yes ☐ No ☒ NA
- C. Are records maintained of these inspections? ☐ Yes ☐ No ☒ NA
- XI. Was the tank(s) used for the management of hazardous waste prior to July 14, 1986? V-2 only ☒ Yes ☐ No ☐ NA
- A. If yes, does the tank system(s) have secondary containment? ☒ Yes ☐ No ☐ NA
- B. If no, has a written assessment that attests to the integrity of the tank(s) been prepared by an independent registered engineer? ☐ Yes ☐ No ☒ NA
- If yes, did the assessment include the following:
1. Design standards according to which the tank and ancillary equipment were constructed? ☒ Yes ☐ No

- | | | | |
|----|---|--------------------------------------|----|
| 2. | Existing corrosion protection measures? | <input checked="" type="radio"/> Yes | No |
| 3. | Hazardous characteristics of the waste to be handled? | <input checked="" type="radio"/> Yes | No |
| 4. | Documented age of the tank system (if available) or estimate of the age? | <input checked="" type="radio"/> Yes | No |
| 5. | Results of a leak test, internal inspection, or other tank integrity examination? (If the results of this test show the tank to be leaking or unfit for use, the owner must implement 40 CFR 265.196.) <i>Tank 15C leak - regulation implemented.</i> | <input checked="" type="radio"/> Yes | No |
| 6. | Is the leak test conducted annually by an independent, qualified, registered engineer? (40 CFR 265.193(l)(1) and (2)) | <input checked="" type="radio"/> Yes | No |
| 7. | Are records of the assessment results maintained on file at the facility? | <input checked="" type="radio"/> Yes | No |

Schedule date when secondary containment is required per schedule in 40 CFR 265.193(a) (1 through 5). _____

Existing Tank System(s)

☒ Adequate ☐ Inadequate

New Tank System(s)

- XII. Is the tank system(s) required to have secondary containment (new system or according to schedule in 40 CFR 265.193(a)(1 through 5)? ☒ Yes No
- A. If yes, has the owner or operator requested a variance from the secondary containment? (40 CFR 265.193(g and h) Yes ☒ No NA
- B. If yes, does the secondary containment meet the following minimum requirements? (40 CFR 265.193(b and c)
- | | | | | |
|----|---|--------------------------------------|----|----|
| 1. | Constructed of or lined with materials compatible with the waste and of sufficient strength? | <input checked="" type="radio"/> Yes | No | NA |
| 2. | Placed on a structurally adequate foundation? | <input checked="" type="radio"/> Yes | No | NA |
| 3. | Provided with a leak detection system capable of detecting releases within 24 hours? | <input checked="" type="radio"/> Yes | No | NA |
| 4. | Adequately sloped or designed and operated to drain and remove liquids from leaks, spills or precipitation? | <input checked="" type="radio"/> Yes | No | NA |
- C. If yes, does the secondary containment include one of the following: (40 CFR 265-193(d))
- | | | | | |
|----|--|--------------------------------------|-------------------------------------|----|
| 1. | External liner? | Yes | <input checked="" type="radio"/> No | NA |
| 2. | Vault? | <input checked="" type="radio"/> Yes | No | NA |
| 3. | Double-walled tank? | Yes | <input checked="" type="radio"/> No | NA |
| 4. | Equivalent device approved by the Secretary? | Yes | <input checked="" type="radio"/> No | NA |

D. If yes, does the secondary containment satisfy the following requirements: (40 CFR 265.193(e))

For External Lines and Vaults

- | | | | |
|--|--------------------------------------|--------------------------|--------------------------|
| 1. Adequate capacity to contain 100% of the largest tank within its boundary? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 2. Designed or operated to prevent infiltration of precipitation into the containment system unless it has adequate capacity to contain a 25 year, 24 hour rain event? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 3. Free of cracks or gaps? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 4. Completely surrounds the tank and surrounding earth likely to be exposed to waste if a release occurs? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |

For Vaults

- | | | | |
|--|--------------------------------------|--------------------------|--------------------------|
| 1. Constructed with chemical-resistant water stops at all joints? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 2. Provided with an impermeable coating or lining over the concrete? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 3. Protected against vapor ignition, if required due to the waste characteristics? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |
| 4. Provided with an exterior moisture barrier? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | <input type="radio"/> NA |

For Double-Walled Tanks

- | | | | |
|---|---------------------------|--------------------------|-------------------------------------|
| 1. Designed as an integral structure for containment of releases? | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |
| 2. If metal, is it protected from corrosion, if metal? | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |
| 3. Provided with a built-in continuous leak detection system capable of detecting releases within 24 hours? | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> NA |

XIII. Is ancillary equipment provided with adequate secondary containment? (40 CFR 265-193(f)) ☒ Yes ☐ No ☐ NA

XIV. Has the tank system or secondary containment system had a leak or spill or was it determined to be unfit for use? *TANK 15C* ☒ Yes ☐ No ☐ NA

A. If yes, was it immediately removed from service and appropriate follow-up actions taken as required by 40 CFR 265.196 (b through e)? ☒ Yes ☐ No ☐ NA

XV. If extensive repair has been conducted on the tank system was it recertified in accordance with 40 CFR 270.11(d) and such certification submitted to the Secretary within 7 days? (40 CFR 265.196(f)) ☒ Yes ☐ No ☐ NA

Procedure in place to comply - not yet complete.

New Tank System Requirements

☒ Adequate

☐ Inadequate

Comments: *Tank 15C was found to be leaking. The tank was almost empty and was immediately removed from service. An internal work-order procedure included "lock-out" of tank from system & a repair request. The plant engineer is aware of the necessity to comply w/ 40 CFR 265.193. Plans are in place to repair the tank & place back in service.*

4.25

Hazardous Waste Tank Storage (S02) Service¹

VESSEL	CAPACITY - WORK (gal)	CAPACITY - MAX (gal)	LOCATION
V-1	7,181	7,363	Process Area
V-2	7,084	7,084	Process Area
V-3	7,181	7,363	Process Area
V-4	7,181	7,363	Process Area
V-5	20,895	20,895	Process Area
V-6	20,895	20,895	Process Area
V-7	7,181	7,363	Process Area
V-8	7,181	7,363	Process Area
V-9	5,078	5,078	Building D
V-10	5,078	5,078	Building D
V-11	5,078	5,078	Building D
V-12	5,078	5,078	Building D
V-13	5,078	5,078	Building D
V-14	5,078	5,078	Building D
V-15A	2,659	2,659	Building D
V-15B	2,659	2,659	Building D
V-15C	2,659	2,659	Building D
V-15D	2,659	2,659	Building D
V-16	9,028	9,028	Building D
V-17	522	522	Process Area
V-18	489	489	Building D
V-26	1,129	1,155	Process Area
V-29	90	90	Building D
V-30	90	90	Building D
V-31	115	115	Building D
V-32	115	115	Building D
V-34	539	539	Process Area
TOTAL	138,000	138,936	N/A

June 30, 1993
inspection

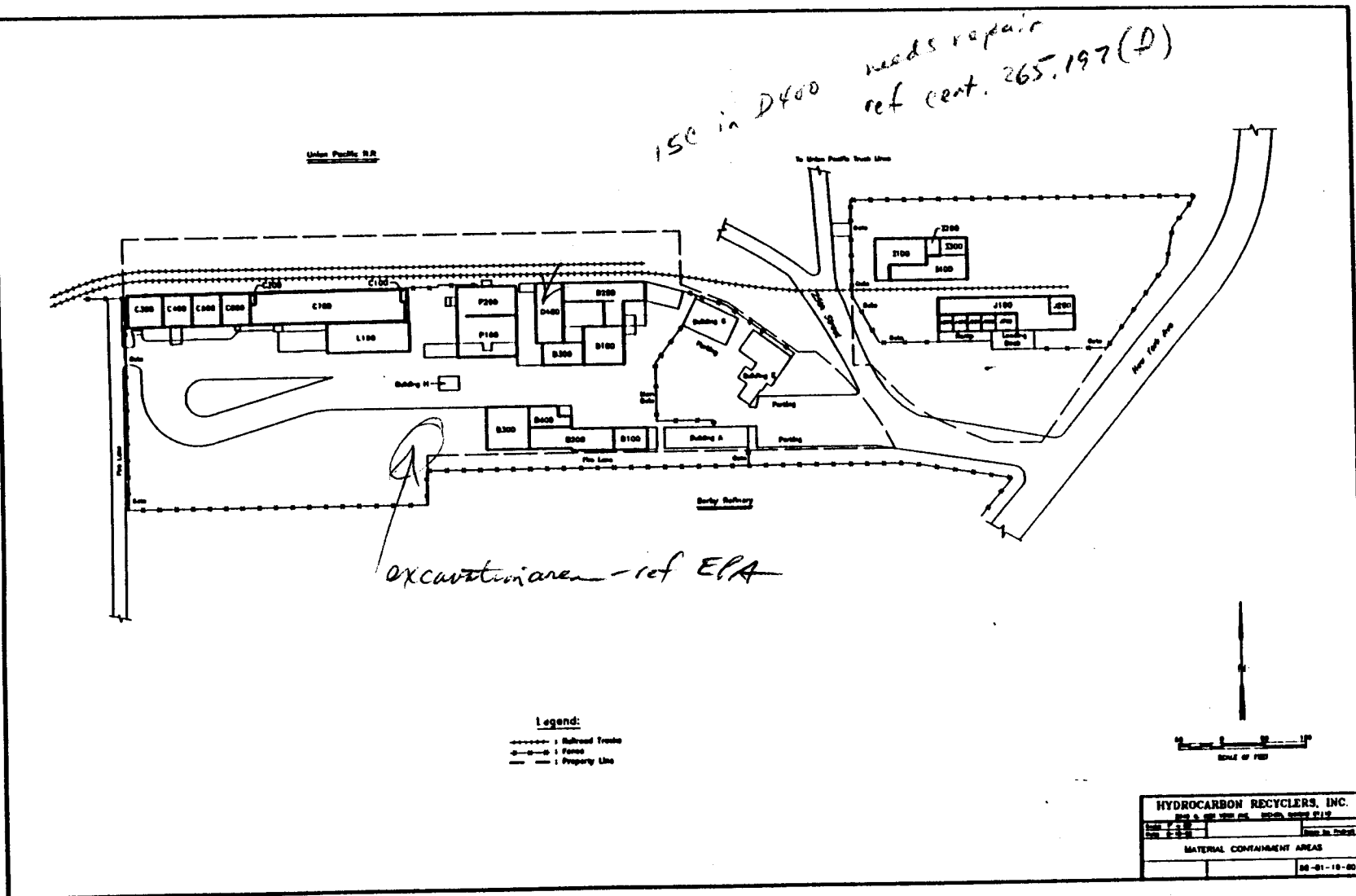


Figure D.2. Material Containment Areas

- Container count -

DRUM INVENTORY

W/E: 06/24/93

	Thur	Fri	06/18	Sat	06/19	Mon	06/21	Tue	06/22	Wed	06/23	Thur	06/24	Totals								
	BAL	REC	CMP	BAL	REC	CMP	BAL	REC	CMP	BAL	REC	CMP	BAL	REC	CMP	REC	CMP					
Kiln Fuel	16	48	24	40		3	37	18	37	18	54	87	-15	31	37	-21	10	56	-67	161	244	Kiln Fuel
Solid Incin	180	39	22	197		1	196	14	27	183			183	17		200	5		205	75	50	Solid Incin
Acid Incin	19			19			19		19	0			0			0			0	0	19	Acid Incin
Base Incin	21			21			21		21				21			21			21	0	0	Base Incin
Gondola	53	8		61			61		61		1	60				60	12		72	20	1	Gondola
Perc Cartridge	0			0			0		0				0			0			0	0	0	Perc Cartridge
Perc Stillbottom	0			0			0		0				0			0			0	0	0	Perc Stillbottom
Liquid Incin	0	5		5			5		5				5			5			5	5	0	Liquid Incin
Acid Landfill	90			90			90		90		8	82				82			82	0	8	Acid Landfill
Base Landfill	4			4			4		4		4	0				0			0	0	4	Base Landfill
Hot Box	0			0			0		0				0			0			0	0	0	Hot Box
KF Pyro	0			0			0		0				0			0			0	0	0	KF Pyro
1,1,1 TCA	2	4		6			6		6				6		20	26			0	24	26	1,1,1 TCA
Flushsolve 6	0			0			0		0				0			0			0	0	0	Flushsolve 6
Essex Corp	0			0			0		0				0			0			0	0	0	Essex Corp
Lab Pack	411			411			411		160	251			251			251			251	0	160	Lab Pack
Storage Drums	20			20			20		20				20			20			20	0	0	Storage Drums
Waste Water	71	2		73			73		73				73	8		81	17		98	27	0	Waste Water
Freon	2			2			2		2				2			2		1	1	0	1	Freon
Perchloroethylene	2			2			2		2				2	1		3			3	1	0	Perchloroethylene
O-2 Cannisters	0			0			0		0				0			0			0	0	0	O-2 Cannisters
Empty Drums	9			9			9		9				9			9	38		47	38	0	Empty Drums
Carbon Drums	0			0			0		0				0			0			0	0	0	Carbon Drums
Mercury	7			7			7		7				7			7			7	0	0	Mercury
Rejects	0			0			0		0				0			0			0	0	0	Rejects
Ciba Geigy	0			0			0		0				0			0			0	0	0	Ciba Geigy
Ni/Cad Batteries	1	1		2			2		2				2			2			2	1	0	Ni/Cad Batteries
Solids Dryer	0			0			0		0				0			0			0	0	0	Solids Dryer
Grinder Material	14			14			14		14				14	5		19			19	5	0	Grinder Material
Sample Jars	0			0			0		0				0			0			0	0	0	Sample Jars
SHMMU	26			26			26		26				26			26			26	0	0	SHMMU
LM by Drum	115	245		360			360	13	373		74	299				299			299	258	74	LM by Drum
Rock	0			0			0		0				0			0			0	0	0	Rock
Pesticides/Poison	0			0			0		0				0			0			0	0	0	Pesticides/Poison
Drums in Process	1040	99	346	793	0	0	793	70	42	821	173	54	940	39	62	917	41	102	856	422	606	Drums in Process
TOTAL	1063	352	46	1369	0	4	1365	45	243	1167	54	174	1047	62	37	1072	102	83	1091	615	587	
	2103			2162			2158			1988			1987			1989			1947			
				59			-4			-170			-1			2			-42			

Exp
FIMS

Post-it™ brand fax transmittal memo 7871		# of pages > 2
To	GIL PEREZ	
From	C. MANS	
Co.	KDHE	
Co.	USPLI.	
Dept.	Phone # 268-9490	
Fax #	838-0042	
Fax #	268-9498	

STATE OF KANSAS



DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field

Topeka, Kansas 66620-0001

Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary
Gary K. Hulett, Ph.D., Under Secretary

December 7, 1988

David G. Trombold
Hydrocarbon Recyclers, Inc.
2525 North New York
Wichita, Kansas 67219

Re: December 6, 1988 Telephone Conversation
EPA I.D. Number KSD007245846

Dear Mr. Trombold:

This letter will confirm our conversation regarding the applicability of 40 CFR 266.34 to your facility as a potential marketer of hazardous waste fuel.

Your first question was whether generators of hazardous waste or other treatment, storage and disposal facilities (such as Ashland Oil Company in Kansas City, Kansas) that ship hazardous waste to you are considered marketers of hazardous waste fuel. The answer is no since they are not shipping the waste directly to a facility that is burning the hazardous waste as fuel.

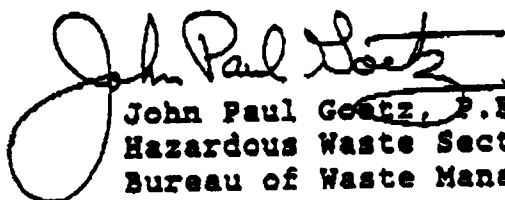
The second question was whether your facility is considered a marketer of hazardous waste fuel. Your facility would be defined as a marketer and subject to 40 CFR 266.34 if you ship the hazardous waste directly to a burner. If you ship it to another facility that does not burn it or through a broker such as Systech Corporation then you are not considered a marketer. Therefore each shipment of potential hazardous waste fuel must be evaluated to determine whether the receiving facility is burning hazardous waste fuel before you can determine whether you are a marketer.

*Not a marketer
by definition*

David G. Trombold
December 7, 1988
Page 2

If I can be of any further assistance please contact me at (913)
296-1607.

Sincerely,



John Paul Goetz, P.E., Chief
Hazardous Waste Section
Bureau of Waste Management

df/trombold.jpg
C Dale Stuckey
Jim Fischer

Example

03/17/93

POLLUTION CONTROL IS PROUD TO BE A FULL SERVICE COMPANY!
 want to assist you with the proper completion of the Uniform Hazardous Waste Manifest for this waste stream. Based on your generator information received and our analytical data from WS NUMBER # WI93-0947, we suggest your waste stream could be shipped using the following information.

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. KSD043066737	Manifest Document No.	2. Page 1 of ____	
3. Generator's Name and Mailing Address GREIF BROS CORP BOX 46 WINFIELD KS 67156		A. State Manifest Document No.		
4. Generator's Phone (316) 221-2330		B. State Generator's ID		
5. Transporter 1 Company Name U.S. Pollution Control Inc.	6. US EPA ID Number	C. State Transporter's ID		
		D. Trans. Phone (713) 350-7228		
7. Transporter 2 Company Name	8. US EPA ID Number	E.		
		F.		
9. Designated Facility Name and Site Address Hydrocarbon Recyclers Inc. 2549 North New York WICHITA KS 67219	10. US EPA ID Number KSD007246846	G. State Facility's ID		
		H. Facility's Phone (316) 268-9490		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	13. Total Qty	14. Unit Wt/vol	I. Waste No.
a. RM, HAZARDOUS WASTE, LIQUID, n.o.s. (F001) 9 NA3082				F001
b.				
c.				
d.				
J. Additional Descriptions for Materials Listed Above WI93-0947 - HYDRO PER	K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information				
16. Generator's Certification PLEASE BE SURE THE GENERATOR HAS SIGNED AND DATED IN THIS SECTION OF THE MANIFEST !!				

* If Hazardous Waste N.O.S., must list two components that caused this waste to be hazardous.
 Location of Facility may require a State insignia upon the Manifest. Please check with the facility if not sure.

EXAMPLE

HAZARDOUS WASTE RECEIVED CHECKLIST

(TO BE COMPLETED FOR EACH INCOMING WASTESTREAM)

Receipt Date: 03/10/93

INFORMATION FROM MANIFEST

Generator: Bradbury Co. Inc. Custcode: B031 Manifest #: 00006
 Air Industrial Park EPA ID#: KSD990874513 Line #: 11A
 Moundridge KS 67107 Labcode: 930976
 Quantity: 6 DM 3000 P Drum #: Acceptance: WI90-3802
 DOT Info: WPRM FLAMMABLE LIQUID NA1263
 EPA Codes: D001,F003,F005

INFORMATION FROM DRUMS

Is label generator different from manifest? NO If yes, give name(s) _____
 DOT Shipping Name _____ Hazard Class Label _____ EPA Waste # _____ Total # of Dms. 6
 Size of Containers: 6 55 gal _____ 85 gal _____ 20 gal _____ 5 gal _____ Other() _____ Other() _____
 Correct Manifest Document # on each label _____ Accum. Start Date on each label _____
 Have discrepancies between manifest, labels, and drum #'s been reported? _____ To whom? _____
 Are any drums leaking? Yes _____ No ✓ How many? _____ Is the leak controlled? Yes _____ No _____
 Are there any drums excessively dented or rusted? Yes _____ No ✓ How many? _____
 All drums of wastestream are sampled, composite sample made (mixed for at least 1 min.),
 and a one pint sample made _____, compatibility _____ Date 3-10-93 If incompatible, explain in
 what way. _____
 Have unacceptable drums and incompatible reactions been reported? _____ To whom? _____
 Completed by _____ Date 3-10-93

SOLIDS DEPTH (in inches) AND SPECIFIC GRAVITY IN LIQUID DRUMS

in.	pH	spg.	in.	pH	spg.	in.	pH	spg.	in.	pH	spg.
1. 15"	6	.86	26.			51.			76.		
2. 20"	7	.87	27.			52.			77.		
3. 22"	6	.89	28.			53.			78.		
4. 8	8	.88	29.			54.			79.		
5. 22"	8	.90	30.			55.			80.		
6. 5"	8	.89	31.			56.			81.		
7.			32.			57.			82.		
8.			33.			58.			83.		
9.			34.			59.			84.		
10.			35.			60.			85.		
11.			36.			61.			86.		
12.			37.			62.			87.		
13.			38.			63.			88.		
14.			39.			64.			89.		
15.			40.			65.			90.		
16.			41.			66.			91.		
17.			42.			67.			92.		
18.			43.			68.			93.		
19.			44.			69.			94.		
20.			45.			70.			95.		
21.			46.			71.			96.		
22.			47.			72.			97.		
23.			48.			73.			98.		
24.			49.			74.			99.		
25.			50.			75.			100.		

Comments: _____

Disposal: KF ✓ (_____ %Cl) Wastewater _____ (F-listed _____) Incineration _____
 Landfill: Gondola _____ Corrosive _____ (Normality _____) Battery _____ F006 _____
 Reclamation: Solvent _____ (_____ %Yield) Oil _____ Sparging _____ TULSA ONLY _____

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
RCRA Permit Application
Section H
Contingency/Emergency Plan

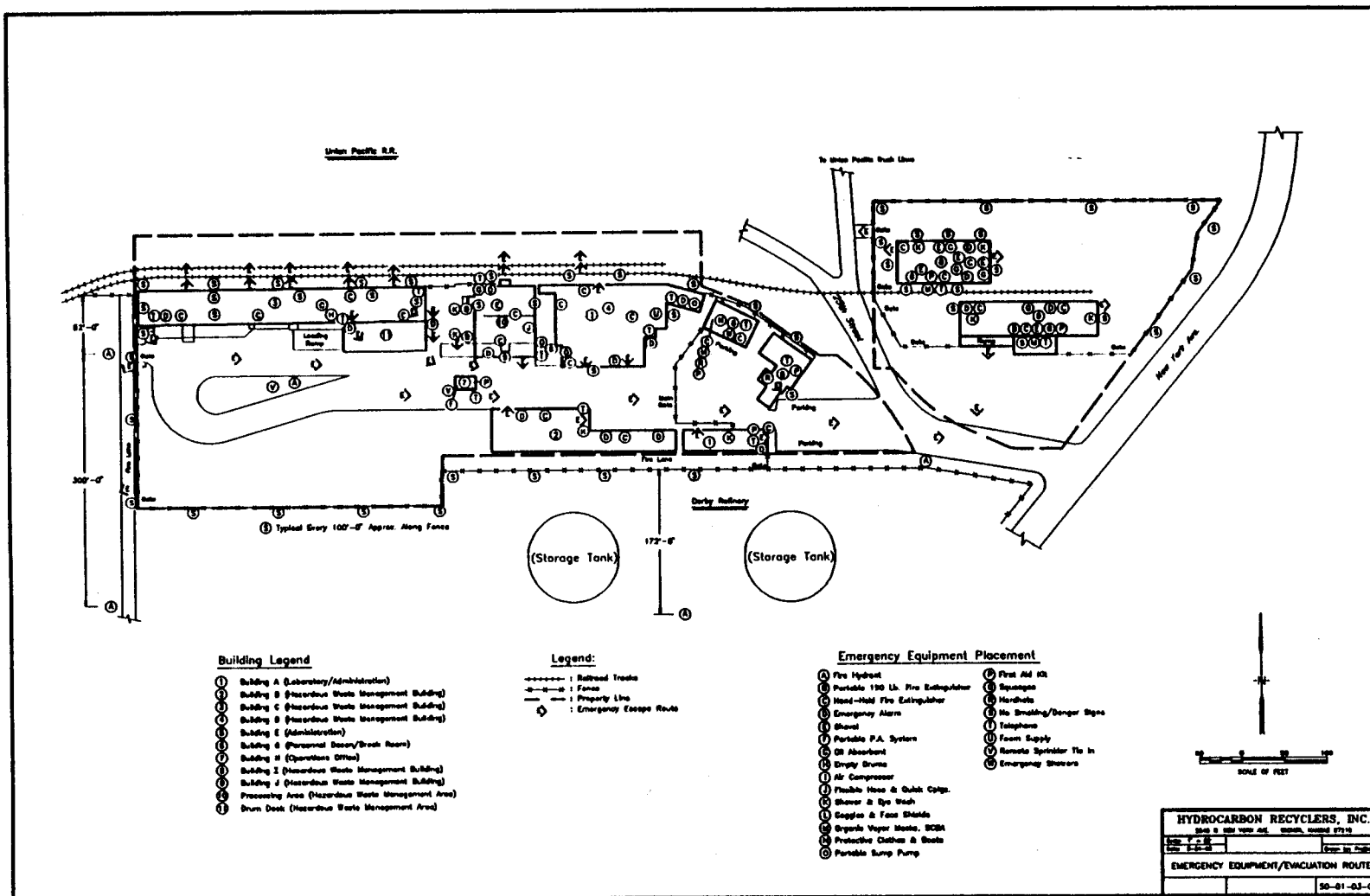


Figure H.1. Emergency Equipment/Evacuation Routes

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
 RCRA Permit Application
 Section D
 Use and Management of Containers

Table D.1
Container Storage Building Capacities

Container Storage Building	Materials Managed	Permitted Storage Capacity (Gallons)	Storage Capacity (55 Gallon Drum Equivalents)
Building D	Ignitable and/or non-ignitable or combination of both	46,640	848
Processing Area	Liquid and solid hazardous and/or non-hazardous materials	9,900	180
Building C	Ignitable and non-ignitable hazardous and non-hazardous materials	99,110	1,802
Drum Dock	Containerized materials	14,960	272
Building B	Corrosives and other non-ignitable hazardous and non-hazardous materials	55,000	1,000
Building I	Hazardous and non-hazardous materials	50,600	920
Building J	Hazardous and non-hazardous materials	49,280	896
Total Capacity		325,490	5,918

Note: Total capacity (gallons) is the additive container storage capacity for all storage buildings. Note that additional storage of waste in tanks occurs in some of these areas; permitted waste tank storage capacity is not reflected in this summary.

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
 RCRA Permit Application
 Section D
 Use and Management of Containers

Table D.2

CMU Containment Summary

Container Management Unit (CMU)	Maximum Number of Drums Stored (55 gallon drum equivalents)		Gallons - Containment Capacity Required for Containers (10 % Container Capacity)	Gallons - Containment Provided
	Drums	Gallons		
D100/D200	784	43,120	4,312	13,480
D300	64	3,520	352	3,606
P100/P200	180	9,900	990	32,583
C100	16	880	88	244
C200	16	880	88	192
C300	240	13,200	1,320	3,842
C400	184	10,120	1,012	3,195
C500	192	10,560	1,056	3,233
C600	192	10,560	1,056	3,233
C700	962	52,910	5,291	16,690
L100	272	14,960	1,496	1,835
B100	120	6,600	660	2,262
B200	384	21,120	2,112	5,592
B300	360	19,800	1,980	5,630
B400	136	7,480	748	2,582
I100	416	22,880	2,288	5,399
I200	64	3,520	352	483
I300	128	7,040	704	870
I400	312	17,160	1,716	3,407

Hydrocarbon Recyclers, Inc. of Wichita d/b/a USPCI
RCRA Permit Application
Section D
Use and Management of Containers

J100	448	24,640	2,464	6,787
J200	96	5,280	528	987
J300	64	3,520	352	502
J400	64	3,520	352	502
J500	64	3,520	352	502
J600	64	3,520	352	502
J700	96	5,280	528	754

Note 1: These containment volume requirements do not include requirements for tank systems. The letter shown in the CMU identification number indicates the location by building (D - Building D, P - Processing Area, C - Building C, L - Drum Dock, B - Building B, I - Building I, and J - Building J).

Note 2: The largest container in Area I100 would be a 5,000 gallon tanker. The containment provided (5,399 gallons) is sufficient to hold the volume of this container.



Hazardous Waste Compliance Monitoring and Enforcement Log

RECEIVED
BUREAU OF
LTP 9/23/93
SEP 1 0 1993

FORM
A

HANDLER

ID NUMBER: KSD 007246846

LDF () TSF (X) GEN (X)
HWM () HWB () UOM ()

KG () SQ () TRA ()
UOB () NOT A GEN
WASTE MANAGEMENT

HANDLER NAME: Hydrocarbon Recyclers, Inc. (HRI)

AT IV 11/1
FT 9/14/93

RCRISQ 12/93

STREET: 2549 North New York

CITY: Wichita 67219

EVALUATION

New ☒ Followup ☐ Delete ☐

Date 93 06 30 Agency S Type CEI Reason 00 Person GLP District SC

Areas of Evaluation (EV - Evaluted, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other					
GER	EV	GPT	EV	DCH	EV	DGW		DMC	EV	DPP		CAS	
GGR	EV	GRR	EV	DCL	EV	DIN		DMR	EV	DSI		FEA	
GLB	EV	GSC		DCP	EV	DLB	EV	DOR		DTR		ILD	
GMR	EV	GSQ		DFR	EV	DLF		DOT		DTT			
GOR				DGS	EV	DLT	EV	DPB		DWP			

COMMENTS

INITIAL INSP 93

VIOLATION # 1

Link to:

New ☒ Change ☐ Delete ☐

Comments

Agency S Number 19 Area DLB Class 2 Priority 5R

Regulation Citation: KAR 28-31-14

Date Determined

Returned to Compliance

MM DO YY
06 30 93

Scheduled: MM DO YY
08 16 93

Actual: MM DO YY

VIOLATION #

Link to:

New ☐ Change ☐ Delete ☐

Comments

Agency S Number Area Class Priority Type

Regulation Citation:

Date Determined

Returned to Compliance

MM DO YY

Scheduled: MM DO YY

Actual: MM DO YY

VIOLATION #

Link to:

New ☐ Change ☐ Delete ☐

Comments

Agency S Number Area Class Priority Type

Regulation Citation:

Date Determined

Returned to Compliance

MM DO YY

Scheduled: MM DO YY

Actual: MM DO YY

VIOLATION #

Link to:

New ☐ Change ☐ Delete ☐

Comments

Agency S Number Area Class Priority Type

Regulation Citation:

Date Determined

Returned to Compliance

MM DO YY


Scheduled: MM DO YY





























Actual: MM DO YY

**FORM
B**

Handler Name: Hydrocarbon Recyclers, Inc. (HRI)

VIOLATION #		Link to:	
New <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>	Comments <input type="checkbox"/>
Agency	Number	Area	Class
<input type="text" value="S"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
Priority	Type		
<input type="text"/>	<input type="text"/>		
Regulation Citation:			
Date Determined		Returned to Compliance	
MM	DD	MM	DD
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
YY		Scheduled:	
<input type="text"/>		<input type="text"/>	<input type="text"/>
		Actual:	
		<input type="text"/>	<input type="text"/>

Link to: 

Agency	Violation Number	Area
	   	 
	   	 
	   	 
	   	 

Comments: